

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and) Civil Action No. 3:16-cv-02267
on Behalf of All Others Similarly Situated,)
) Honorable Aleta A. Trauger
Plaintiff,)
) LEAD PLAINTIFF'S MOTION FOR
vs.) LEAVE TO FILE UNDER SEAL
CORRECTIONS CORPORATION OF)
AMERICA, et al.,)
)
Defendants.)
)

Pursuant to Rules 5.03 and 7.01 of the Civil Local Rules of Court (“LR”) and Administrative Order No. 167-1: Administrative Practices and Procedures for Electronic Case Filing, §5.07, Plaintiff¹ hereby moves the Court for leave to file its Reply in Support of Lead Plaintiff’s Motion for Reconsideration of the January 18, 2019 Order Denying Class Certification (“Reply”) under seal.

Under the Revised Stipulation and Protective Order (ECF No. 86) (“Protective Order”), Plaintiff is required to “file[] under seal, redacted, or protected from public disclosure” any document that it submits to the Court and that reflects “Confidential Discovery Material.” Protective Order, ¶12. The information Plaintiff proposes to file under seal was produced by Defendants in discovery and designated “Confidential.” In connection with Plaintiff’s motion for reconsideration of the Court’s January 18, 2019 Order (ECF Nos. 148-152), the Court granted Defendants’ motion to file this information under seal (ECF No. 156) (“Sealing Order”). Pursuant to the Protective Order and the Court’s Sealing Order, Plaintiff seeks leave to file the same information under seal in its Reply.

DATED: February 22, 2019

Respectfully submitted,

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¹ “Plaintiff” is Lead Plaintiff Amalgamated Bank, as Trustee for the LongView Collective Investment Fund. “Defendants” are Corrections Corporation of America and certain of its executives.

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on February 22, 2019, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

S/ Willow E. Radcliffe
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- (No manual recipients)